

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

RICH REINISCH, Derivatively on Behalf of)	Civil Action No. 1:04-cv-10215-NG
BIOPURE CORPORATION,)	
)	Assigned to: Judge J. Nancy Gertner
Plaintiffs,)	
)	Magistrate Judge Alexander
vs.)	
)	
THOMAS A. MOORE, et al.)	
)	<u>DERIVATIVE ACTION</u>
Defendants,)	
)	
-and-)	
)	
BIOPURE CORPORATION, a Delaware)	
Corporation,)	
)	
Nominal Defendant.)	

FILED FEE PAID: 548.20
RECEIPT # 50.00
AMOUNT \$ 50.00
BY DPTY CLK
DATE 3/25/04

MOTION FOR ADMISSION *PRO HAC VICE*

Pursuant to Rule 83.5.3(b) of the Local Rules of the U.S. District Court for the District of Massachusetts, I, Mary T. Sullivan, a member in good standing of the bar of this Court, hereby move for the admission *pro hac vice* of the following counsel:

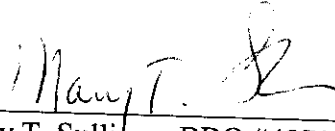
Jeffrey P. Fink, Esq.
Robbins, Umeda & Fink LLP
1010 Second Ave., Suite 2360
San Diego, CA 92101

for the purpose of litigation in this Court as attorney for the Plaintiffs. Messr. Fink certifies herewith that he is a member in good standing of the Northern, Central and Southern Districts of California and the Eastern District of Wisconsin and is a member in good standing in each other jurisdiction to which he is admitted to practice; there are no disciplinary proceeding pending

against him in any jurisdiction; and he has studied the Local Rules of this Court.

Dated: March 24, 2004.

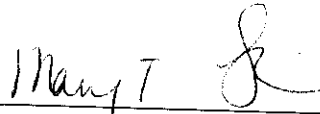
Respectfully submitted,



Mary T. Sullivan, BBO #487130
SEGAL ROITMAN & COLEMAN
11 Beacon Street, Suite 500
Boston, MA 02108
Telephone: 617/742-0208
Facsimile: 617/742-2187

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing Motion for Admission *Pro Hac Vice* has been served on Robert A. Buhlman, Esq. and Eunice E. Lee, Esq., Bingham McCutchen LLP, 150 Federal Street, Boston, MA 02110, counsel for defendants, via U.S. First-Class mail, postage-prepaid, on this the 24 day of March, 2004:



Mary T. Sullivan